

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

THERESA ALLEN, INDIVIDUALLY, §
AND AS NEXT FRIEND TO ELISHA TYRELL §
ALLEN AND KATELYNN TYREAL ALLEN §
PLAINTIFFS, §

V. §

TEXAS DEPARTMENT OF FAMILY AND §
PROTECTIVE SERVICES, HOWARD BALDWIN, §
YOLANDA ALPOUGH, ADRIAN HOMER, §
STEPHANIE HAMMON, IVY CHAMBERS, §
AND UNKNOWN COMMISSIONERS, §
SUPERVISORS OR DIRECTORS OF §
YOLANDA ALPOUGH, ADRIAN HOMER §
AND STEPHANIE HAMMON §
DEFENDANTS. §

CIVIL ACTION No. 4:11-CV-04170

DEFENDANT’S NOTICE OF SUBSTITUTION OF COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendants, Texas Department of Family and Protective Services (“DFPS”), Howard Baldwin, Yolanda Alpough, Adrian Homer, Stephanie Hammon and Ivy Chambers, in their individual capacities, and files this Notice of Substitution of Counsel of Record, respectfully showing the Court as follows:

1. Assistant Attorney General Gunnar P. Seaquist enters his appearance as counsel of record for Defendants, Texas Department of Family and Protective Services (“DFPS”), Howard Baldwin, Yolanda Alpough, Adrian Homer, Stephanie Hammon and Ivy Chambers, in their individual capacities, and its substitution as counsel for Assistant Attorney General Timothy Earl Bray, who is no longer assigned to this case.

2. Defendants, Defendants, Texas Department of Family and Protective Services (“DFPS”), Howard Baldwin, Yolanda Alpough, Adrian Homer, Stephanie Hammon and Ivy

Chambers, in their individual capacities,, asks that the Clerk of this Court and all counsel of record take notice of this change in representation for Defendants, Defendants, Texas Department of Family and Protective Services (“DFPS”), Howard Baldwin, Yolanda Alpough, Adrian Homer, Stephanie Hammon and Ivy Chambers, in their individual capacities,

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

DAVID C. MATTAX
Deputy Attorney General for Defense Litigation

ROBERT B. O'KEEFE
Chief, General Litigation Division

/s/ Gunnar P. Seaquist
Gunnar P. Seaquist
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Attorneys for Defendant

CERTIFICATE OF FILING AND SERVICE

I hereby certify that, on August 17, 2012, a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) with the Clerk of the Court of the U.S. District Court for the Southern District of Texas, and that counsel identified below would be advised of and given access to a copy of the filing.

Mr. Chris Branson
5380 West 34th Street #221
Houston, Texas 77092
Attorney in Charge for Plaintiff Theresa Allen

Additionally, copies were sent via U.S. First Class Mail to:

Mr. Steven D. Poock
P.O. Box 984
Sugar Land, Texas 77487
Attorney in Charge for
Plaintiff Elisha Tyrell Allen

Mr. Tom Sanders
P.O. Box 1860
Sugar Land, Texas 77478
Attorney in Charge for
Plaintiff Katelynn Tyrell Allen

/s/ Gunnar P. Seaquist
Gunnar P. Seaquist